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BEFORE THE ARIZONA CORPORATION COMMISSION

KRISTIN K. MAYES  
Chairman

2011 JAN 26 P 3: 36

GARY PIERCE  
Commissioner

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Arizona Corporation Commission

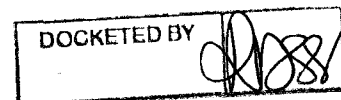
DOCKETED

PAUL NEWMAN  
Commissioner

JAN 26 2011

SANDRA D. KENNEDY  
Commissioner

BOB STUMP  
Commissioner



IN THE MATTER OF QWEST  
CORPORATION'S PETITION FOR  
ARBITRATION AND APPROVAL OF  
INTERCONNECTION AGREEMENT  
WITH NORTH COUNTY  
COMMUNICATIONS  
CORPORATION OF ARIZONA  
PURSUANT TO SECTION 252(B) OF  
THE COMMUNICATIONS ACT OF  
1934 AS AMENDED BY THE  
TELECOMMUNICATIONS ACT OF  
1996 AND APPLICABLE STATE  
LAWS.

DOCKET NOS. : T-01051B-09-0383  
T-03335A-09-0383

**MOTION TO EXTEND TIME FOR  
REPLY TESTIMONY AND  
ARBITRATION HEARING**

NORTH COUNTY COMMUNICATIONS CORPORATION ("North County")  
hereby respectfully requests that the hearing in the above-referenced arbitration be  
extended from the currently scheduled date of February 8, 2011, to March 16, 2011, and  
that the deadline for the parties' reply testimony be extended from the current deadline of  
January 28, 2011, to February 11, 2011.

Counsel for Qwest Corporation ("Qwest") has indicated that Qwest is agreeable to  
the requested extensions of time in light of North County's change of counsel in this  
matter. *See* Declaration of R. Dale Dixon, Jr., ¶3.

North County's request is for good cause and is based on the fact that North  
County has engaged new counsel for this arbitration proceeding and hearing. Dixon  
Dec., ¶¶2,5; Declaration of Todd Lesser, ¶¶3-4. A *pro hac vice* application, along with

1 all related documentation and fee(s), will be submitted to the State Bar of Arizona by  
2 North County's new counsel, R. Dale Dixon, Jr., through North County's local counsel  
3 (William G. Klain), no later than January 28, 2011. Dixon Dec., ¶4.

4 RESPECTFULLY SUBMITTED this 26<sup>th</sup> day of January, 2011.

5  
6 **LANG BAKER & KLAIN, PLC**

7  
8 By: 

9 William G. Klain  
10 8767 Via de Commercio, Suite 102  
11 Scottsdale, AZ 85258  
12 Attorney for North County Communications  
13 Corporation

14 **ORIGINAL** and 13 copies of the foregoing  
15 filed this 25 day of January, 2011 with:

16 Docket Control  
17 Arizona Corporation Commission  
18 1200 West Washington Street  
19 Phoenix, AZ 85007

20 **COPY** of the foregoing hand-delivered  
21 this same day to:

22 Jane L. Rodda, Arbitrator  
23 Hearing Division  
24 ARIZONA CORPORATION  
25 COMMISSION  
26 400 W. Congress, Suite 218  
Phoenix, Arizona 85007

Maureen Scott, Staff Attorney  
Legal Division  
ARIZONA CORPORATION  
COMMISSION  
1200 W. Washington Street  
Phoenix, Arizona 85007

Janice Alward, Chief Counsel  
Legal Division  
ARIZONA CORPORATION  
COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

Steve Olea, Director  
Utilities Division  
ARIZONA CORPORATION  
COMMISSION  
1200 W. Washington Street  
Phoenix, Arizona 85007

1 **COPY** of the foregoing mailed and/or emailed  
2 this same day to:

3 Norm Curtright  
4 QWEST CORPORATION  
5 20 E. Thomas Road, 16th Floor  
6 Phoenix, AZ 85012  
7 Email: norm.curtright@qwest.com

Lisa Anderl  
QWEST CORPORATION  
1600 7th Avenue, Room 3206  
Seattle, Washington 98191  
Email: lisa.anderl@qwest.com

6 By: Meghan Mass  
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1. I am over the age of eighteen, and I am the principal officer for North County Communications Corporation ("North County") and have been since its inception in 1990. My business address is 3802 Rosecrans #485, San Diego, California. I have personal knowledge of each matter stated in this declaration and if called as a witness to testify as to the matters stated herein, could and would competently do so.

10           3.       On or about January 17, 2011, North County retained R. Dale Dixon, Jr. of The  
11       Law Offices of Dale Dixon, to replace and substitute in for Anthony E. McNamer of McNamer  
12       & Company, PC, and to represent North County in this interconnection arbitration with Qwest  
13       Corporation.

17  
18 I declare under penalty of perjury under the laws of the State of California that the above  
19 statement is true and correct. Executed January 26, 2011, in San Diego, California.

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**DECLARATION OF R. DALE DIXON, JR.**

I, R. Dale Dixon, Jr., declare:

1. I am an attorney licensed to practice law in California and Oregon, and I am an attorney for North County Communications Corporation ("North County"). I have personal knowledge of each matter stated in this declaration and if called as a witness to testify as to the matters stated herein, could and would competently do so.

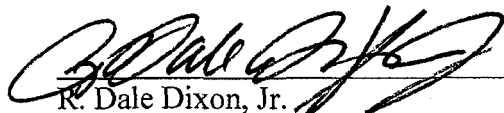
2. On or about January 17, 2011, North County retained me and my firm, The Law Offices of Dale Dixon, to replace and substitute in for Anthony E. McNamer of McNamer & Company, PC, and to represent North County in this interconnection arbitration with Qwest Corporation.

3. On January 25, 2011, Qwest Corporation counsel for this matter, Lisa Anderl, informed me that Qwest was agreeable to extending the arbitration hearing and reply testimony deadlines as outlined in North County's Motion to Extend Time.

4. I have completed the State Bar of Arizona *Pro Hac Vice* Application, have received my certificate of good standing from the California bar, expect to receive my certificate of good standing from the Oregon bar this week, and will file, through North County's local counsel (William G. Klain) the State Bar of Arizona *Pro Hac Vice* Application along with the required certificates of good standing and application fee of \$460.00 by January 28, 2011.

5. North County's request for an extension of time in the Qwest interconnection arbitration is for good cause, is needed for me to prepare for the arbitration hearing and submit reply testimony, and is not intended to serve as a means of delay or harassment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 26, 2011, at Carlsbad, California.

  
R. Dale Dixon, Jr.